

From: Rob Hartman [Rob.J.Hartman@mwhglobal.com]
Sent: Monday, December 16, 2013 3:29 PM
To: Rochlin, Kevin
Cc: Sheldrake, Beth; Greutert, Ed [USA]; Barbara Ritchie; Kelly Wright; susanh@ida.net; Bruce.Olenick@deq.idaho.gov; Douglas.Tanner@deq.idaho.gov; Scott.Miller@deq.idaho.gov; Jeff Hamilton; Marguerite Carpenter; David Heineck; Marc Bowman
Subject: RE: FMC Plant OU RDRA Monthly Report #4 - September 2013
Attachments: 2013-12-16 FMC Plant OU RDRA Order Monthly Report #6 - November 2013.pdf
Categories: 11-19 to 1-10 2014

Kevin:

Please find attached the FMC OU RDRA Monthly Report #6 for November 2013 as required under Paragraph 55 of the FMC Plant OU RDRA Unilateral Administrative Order reporting on the status of implementation of the Remedial Design / Remedial Action work. This report covers the time period from November 1 to November 30, 2013.

Rob Hartman
MWH Americas, Inc.
(801) 617-3256



Via email

December 16, 2013

Kevin Rochlin
Remedial Project Manager, Superfund Program
US EPA, Region 10
1200 Sixth Avenue
Seattle, WA 98101

RE: MONTHLY REPORT NO. 6 – NOVEMBER 2013

FMC Operable Unit of the Eastern Michaud Flats Superfund Site
Unilateral Administrative Order for Remedial Design and Remedial Action
Docket No. CERCLA-10-2013-0116

Dear Mr. Rochlin,

This is the monthly report concerning the FMC Plant OU (the site) submitted pursuant to Paragraph 55 of the subject Unilateral Administrative Order for Remedial Design and Remedial Action (UAO), effective June 20, 2013. This report describes the time period between November 1, 2013 and November 30, 2013.

a) ACTIONS TAKEN DURING THE TIME PERIOD:

- Submitted deliverables (listed in item c below) and began preparation of deliverables (listed in item d below) as required based on the effective date of the subject UAO

b) SUMMARY OF SAMPLING RESULTS AND DATA RECEIVED DURING THE TIME PERIOD

- Pursuant to the *Data Gap Work Plan* (DGWP) (as approved by EPA on October 22, 2013), sampling was performed as follows:
 - a. Video surveying of the concrete underground storm water lines as prescribed in Section 3.3 of the DGWP was performed on November 6, 2013;
 - b. Soil boring sampling as prescribed in Table 3.2 and Section 3.1.2 of the DGWP was performed on November 12 and 13, 2013; and
 - c. Vegetation survey sampling as prescribed in Section 3.2 of the DGWP was performed on November 12 and 13, 2013.

The soil samples collected per b. and c. above were submitted to the geotechnical testing laboratories during the week of November 18, 2013. The results/data and an evaluation of those data will be presented in the *Data Gap Investigation Report* that will be submitted within 45 days after completion of the field work or receipt of final material testing report(s) from the laboratory, whichever is later (see item d below).

- Pursuant to the *Interim CERCLA Groundwater Monitoring Plan*, groundwater samples were collected at the designated CERCLA groundwater wells on November 5 and 6, 2013. The results/data of the CERCLA groundwater monitoring will be reported in the *Interim CERCLA 2013 Groundwater Monitoring Report* to be submitted in April 2014.

c) PLANS, REPORTS AND OTHER DELIVERABLES SUBMITTED DURING THE TIME PERIOD

- On November 11, 2013, submitted the response to agency comments and a revised *Remedial Design Work Plan (RDWP)* within 14 days of receipt of agency comments on October 28, 2013.
- On November 25, 2013, submitted the *Gamma Cap Performance Evaluation Report* for field work performed in September and October 2013 pursuant to the *Gamma Cap Performance Evaluation Work Plan and Field Modification #1*. This report was submitted within 45 days of completion of the field work.
- Received Agency comments on December 9, 2013 on FMC's response to comments on the Extraction Zone Hydrogeologic Study (EZH) Work Plan that were submitted on October 31, 2013.
- Received Agency comments on December 12, 2013 on FMC's response to comments on the RDWP that were submitted on November 11, 2013. By email dated December 14, 2013, EPA conditionally approved the RDWP subject to the making the relatively minimal changes and resubmitting the RDWP as final.

d) ACTIONS SCHEDULED FOR THE NEXT TWO MONTHS

- Prepare and submit the *Data Gap Investigation Report* within 45 days after receipt of final material testing reports from the laboratory.
- Revise and submit the EZH Work Plan incorporating Agency comments received on December 9, 2013. Revised EZH Work Plan will be submitted by January 10, 2014 pending EPA approval of FMC's request.
- Revise and submit the RDWP incorporating Agency comments received on December 12, 2013. Conditionally approved final RDWP will be submitted by December 26, 2013.

e) UNRESOLVED DELAYS ENCOUNTERED OR ANTICIPATED THAT MAY AFFECT THE SCHEDULE FOR IMPLEMENTATION OF WORK AND EFFORTS TO MITIGATE

- There are currently no unresolved delays encountered or anticipated, actual and anticipated modifications to the schedule are described in item f below.

f) MODIFICATIONS TO WORK PLANS OR SCHEDULES PROPOSED

- Attached are the updated RD/RA Preliminary Schedules for soil and groundwater remedies (Revision 4.0 to Tables 6-1 and 6-2 of the RDWP). Revision 4.0 includes minor updates to reflect actual dates for completion of the DGWP field work on November 13, 2013, submittal of the Gamma Cap Performance Evaluation Report on November 25, 2013, planned submittal of the final RDWP on December 18, 2013 and submittal of the final EZH Work Plan on January 10, 2014.
- As described in the October 2013 UAO monthly report, FMC has begun preparation of the site-wide grading and storm water management design and will be accelerating preparation and submittal of the Preliminary (30%) Design for the soil remedy. With timely EPA review and approval of these design submittals, site grading should commence during the 2014 construction season. Site-wide grading that creates an integrated stormwater management system is a required precursor to cap construction and is otherwise independent of and does not prejudice the final cap designs (i.e., gamma and ET caps). Schedule for these deliverables:

RD Deliverable / Work Element	Date
Submit Soil Remedy - 30% Design Package; Site-Wide Grading and Stormwater Design and Plans will be submitted at the Pre-final (90%) RD level	March 3, 2014
EPA Comments on 30% RD Package and Site-Wide Grading and Stormwater Design and Plans at the Pre-final (90%) RD level	May 2, 2014
Submit Final (100%) RD Package for Site-Wide Grading and Stormwater Design and Plans	June 2, 2014
EPA approval for Site-Wide Grading and Stormwater Design and Plans	June 30, 2014
Pre-Construction Inspection and Meeting	July 7, 2014
Start of Site-Wide Grading Construction	July 9, 2014

If you have any questions concerning the monthly report, please feel free to call Marc Bowman at (801) 617-3234, Rob Hartman at (801) 617-3256, or Barbara Ritchie at (215) 299-6700.

Sincerely,



Marc Bowman
Project Director
MWH Americas, Inc.



Rob Hartman
RD Manager
MWH Americas, Inc.

Mr. Kevin Rochlin
Remedial Project Manager, Superfund Program
December 16, 2013
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cc: (as required under the UAO and as directed by EPA)

Bruce Olenick, IDEQ

Doug Tanner, IDEQ

Scott Miller, IDEQ

Kelly Wright, Shoshone-Bannock Tribes

Susan Hansen, Shoshone-Bannock Tribes

Soil Remedial Design / Remedial Action Preliminary Schedule (Rev 4.0)

RD Deliverable/Work Element	Schedule per UAO	Baseline ¹ Planned	Revised Plan	Actual
Remedial Design Work Plan				
Submit Remedial Design Work Plan (RDWP)	W/in 45 days EPA approval SC			8/12/2013
EPA Comments on RDWP	NS	9/13/2013		10/28/2013
Submit Final RDWP	14 days or as specified by EPA	9/27/2013		11/11/2013
EPA Approval RDWP	NS	10/14/2013	1/14/2014	
Performance Testing (PT) Work Plans - Soil Remedy				
RD Data Gap (DG) Acquisition Work Plan	W/in 60 days EPA approval SC			7/15/2013
Gamma Cap (GC) Performance Evaluation Work Plan	W/in 60 days EPA approval SC			7/15/2013
EPA approval of GC WP	NS	8/16/2013		9/5/2013
EPA approval of DG WP	NS	8/16/2013		10/22/2013
Execute PTs to Support Soil Remedial Design				
PT Field Work	Per DG/GC Work Plans	8/26 to 9/27/2013		9/11 to 11/13/2013
Submit GC / DG PT Reports	Per DG/GC Work Plans	10/25/2013	12/30/2013	11/25/2013 /
EPA Comments on GC / DG PT Reports	NS	11/22/2013	1/27 / 2/28/2014	
Submit Final GC / DG PT Reports	14 days or as specified by EPA	11/29/2013	2/3 / 3/7/2014	
EPA approval GC / DG PT Reports	NS	12/16/2014	2/17 / 3/20/2014	
Remedial Design - Soil Remedy				
Submit Soil Remedy - 30% Design Package	45 days after EPA approval of GC/DG PT reports	1/27/2014	5/5/2014 ²	
EPA Comments on 30% RD Package	NS	3/6/2014	7/4/2014 ²	
Submit Soil Remedy Pre-Final (90/95%) RD Package	120 days after receipt of EPA comments on 30% RD	5/1/2014	8/29/2014	
EPA Comments on Pre-Final RD Package	NS	5/29/2014	10/30/2014	
Submit Soil Remedy Final RD Package	21 days after receipt of EPA comments on Pre-final RD	6/26/2014	11/27/2014	
Remedial Action Work Plan - Soil Remedy				
Submit Draft RAWP Soil Remedy	Concurrent with Pre-Final RD	5/1/2014	8/29/2014	
EPA Comments on RAWP Soil Remedy	NS	5/29/2014	10/30/2014	
Submit Final RAWP Soil Remedy	Concurrent with Final RD	6/26/2014	11/27/2014	
Remedial Contractor Procurement				
Bid Package Preparation - Soil Remedy	NS	5/5/2014	11/3/2014	
Evaluate Bids / Recommendation	NS	6/26/2014	12/5/2014	
EPA Approval Soil Remedy Final RD and RAWP				
NS	NS	7/7/2014	12/8/2014	
Soil Remedial Action				
Award RA Contract	45 days after EPA approval RAWP	7/10/2014	12/11/2014	
Pre-Construction Inspection and Meeting	30 days after Award RA Contract	7/17/2014	12/18/2014	
Start of Soil Remedy Construction	15 days after Pre-Con Meeting	7/28/2014	4/1/2015	
Institutional Control Program				
Institutional Control Implementation and Assurance Plan	Submit with 30% RD for Soil RA	1/27/2014	5/5/2014	
EPA Comments on ICIAP	NS	4/28/2014	6/30/2014	
Submit Final ICIAP	14 days or as specified by EPA	5/12/2014	7/14/2014	
EPA Approval ICIAP	NS	6/11/2014	8/4/2014	
Implement ICIAP	Per ICIAP			

¹ Baseline schedule is the Planned schedule from Table 6-1 of the draft RDWP, August 2013.

² As described in item f of the November 2013 UAO monthly report, FMC intends to accelerate submittal of the 30% soil design to a March 3, 2014 submittal and, assuming a review of 60 days, would have EPA comments on May 2, 2014.

NS means no schedule (timeframe) specified in UAO.

Groundwater Remedial Design / Remedial Action Preliminary Schedule (Rev 4.0)

RD Deliverable/Work Element	Schedule per UAO	Baseline ¹ Planned	Revised Plan	Actual
Remedial Design Work Plan				
Submit Remedial Design Work Plan	W/in 45 days EPA approval SC			8/12/2013
EPA Comments on RDWP	NS	9/13/2013		10/28/2013
Submit Final RDWP	14 days or as specified by EPA	9/27/2013		11/11/2013
EPA Approval RDWP	NS	10/14/2013	1/14/2014	
Performance Testing (PT) Work Plans - Groundwater Remedy				
Groundwater Extraction Zone Hydrogeologic (EZH) Work Plan	W/in 60 days EPA approval SC			7/15/2013
EPA Comments on GW EZH Work Plan	NS	8/16/2013		9/16/2013
Submit Final Groundwater EZH Work Plan	14 days or as specified by EPA	Not included	1/10/2014	
EPA approval of Groundwater EZH Work Plan	NS	8/16/2013	1/31/2014	
Execute PTs to support Groundwater (GW) Remedial Design				
PT Field Work	Per GW EZH Work Plan	8/26 to 11/8/2013	3/15 to 5/22/2014	
Submit GW EZH Report	Per GW EZH Work Plan	1/10/2014	7/24/2014	
EPA Comments on GW EZH Report	NS	2/7/2014	9/24/2014	
Submit Final GW EZH Report	14 days or as specified by EPA	2/14/2014	10/1/2014	
EPA approval GW EZH Report	NS	2/28/2014	10/29/2014	
Remedial Design - Groundwater Remedy				
Submit Groundwater Remedy - 30% Design Package	45 days after EPA approval of GW EZH Report	3/24/2014	12/12/2014	
EPA Comments on 30% RD Package	NS	4/21/2014	2/12/2015	
Submit Groundwater Remedy - 60% Design Package	90 days after EPA comments on 30% RD	7/21/2014	4/9/2015	
EPA Comments on 60% RD Package	NS	8/22/2014	6/10/2015	
Submit Pre-Final (90/95%) Groundwater RD Package	90 days after receipt of EPA comments on 60% RD	10/24/2014	8/5/2015	
EPA Comments on Pre-Final RD Package	NS	11/24/2014	10/6/2015	
Submit Groundwater Remedy Final RD Package	21 days after receipt of EPA comments on Pre-final RD	12/15/2014	11/3/2015	
Remedial Action Work Plan - Groundwater Remedy				
Submit Draft RAWP Groundwater Remedy	Concurrent with Pre-Final RD	10/24/2014	8/5/2015	
EPA Comments on RAWP	NS	11/24/2014	10/6/2015	
Submit Groundwater Remedy Final RAWP	Concurrent with Final RD	12/15/2014	11/3/2015	
Remedial Contractor Procurement				
Bid Package Preparation Groundwater Remedy	NS	10/30/2014	11/10/2015	
Evaluate Bids / Recommendation	NS	12/19/2014	12/15/2015	
EPA Approval Groundwater Remedy Final RD and RAWP				
	NS	1/15/2015	12/3/2015	
Groundwater Remedial Action				
Award RA Contract - Groundwater	45 days after EPA approval RAWP	3/1/2015	1/19/2015	
Pre-Construction Inspection and Meeting	30 days after Award RA Contract	3/31/2015	2/17/2016	
Start of Construction	15 days after Pre-Con Meeting	4/14/2015	3/2/2016	

¹ Baseline schedule is the Planned schedule from Table 6-2 of the draft RDWP, August 2013.

NS means no schedule (timeframe) specified in UAO.